



M O S K O W I T Z & B O O K , L L P

Avraham C. Moskowitz
AMoskowitz@mb-llp.com

345 Seventh Avenue, 21st Floor
New York, NY 10001
Phone: (212) 221-7999
Fax: (212) 398-8835

August 26, 2021

VIA ECF and Email

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: U.S v. Geovanny Fuentes Ramirez
 15 Cr. 379 (PKC)

Dear Judge Castel;

This letter is respectfully submitted on behalf of the defendant, Geovanny Fuentes Ramirez, to supplement the request for an adjournment of the sentencing made by letter dated August 25, 2021. As Your Honor knows, the sentencing is currently scheduled to take place on August 31, 2021.

This afternoon, Mr. Schulman and I met with Mr. Fuentes Ramirez at the MCC for approximately two hours before we were told we had to leave. During that period, we discussed numerous issues relating to the case and the upcoming sentencing and we began to have the Government's lengthy sentencing submission read to the defendant, with the assistance of a Spanish interpreter. Unfortunately, we were not able to complete the reading and translation of the submission in the time allotted to us. We hope to be able to return to the MCC on Monday, August 30 to finish reviewing the Government's submission with the defendant and to discuss the points that he would like us to make in response. Given that timeframe, it simply will not be possible for defense counsel to respond to the Government's submission before the scheduled sentencing and therefore, the defendant will not be ready to proceed to sentencing on August 31. Accordingly, on behalf of Mr. Fuentes Ramirez, I renew my application for an adjournment of the sentencing until early October. Such an adjournment will provide me the opportunity to complete the review of the Government's submission, discuss it with Mr. Fuentes Ramirez and prepare an appropriate response to the Government's memorandum. In light of the fact that the defendant is incarcerated and is facing a mandatory minimum sentence of forty years imprisonment, there can be no conceivable prejudice to the Government from such an adjournment.

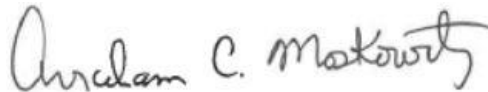
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Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Avraham C. Moskowitz". The signature is written in a cursive, flowing style.

Avraham C. Moskowitz

cc: All counsel of record (by email)